SOLVAY

March 2, 2016

VIA EMAIL (wilwerding.joe@epa.gov)
AND CERTIFIED MAIL/
RETURN RECEIPT REQUESTED

Joe Wilwerding
U.S. Environmental Protection Agency, Region 8
Technical Enforcement Program
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, CO 80202-1129

Dear Mr. Wilwerding:

This letter, and enclosed documents, respond to the January 25, 2016 Follow-up Section 114 (a) Information Request ("2016 Request") to Solvay Chemicals Inc. ("Solvay") from the U.S. Environmental Protection Agency ("EPA"). Solvay received the 2016 Request at its Green River Soda Ash Facility ("Facility") on February 1, 2016. The 2016 Request provides a deadline of 30 days after receipt to provide the requested information. Holland & Hart, Solvay's outside counsel, has proposed a phased production of documents responsive to the 2016 Request. We appreciate your consideration of that proposal and are confident we will be able to agree to a schedule for the production of the remaining documents responsive to the 2016 Request.

In this response, Solvay is providing information responsive to items #3, #5, #9, and #10 of the 2016 Request. Each response below is preceded by a copy of the question from the 2016 Request to which it responds. Solvay is providing responsive documents in the attachment to this letter and has identified documents responsive to each request by Bates number. This response includes confidential business information and the responsive document that includes such information has been labeled "Confidential Business Information." Consistent with Enclosure 4 of the April 28, 2014 Request under Section 114(a) of the Clean Air Act ("2014 Request"), Solvay has answered the questions necessary to assert a claim of business confidentiality for this information in a letter to Lauren Hammond.

As detailed in its July 7, 2014 response to the 2014 Request, this response incorporates Solvay's General Objections and Objections to Definitions in the 2014 Request and 2016 Request. Without waiving or limiting these objections, Solvay has attempted to respond to the 2016 Request as completely and accurately as possible based on the information presently available.

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SOLVAY'S RESPONSES TO REQUEST FOR INFORMATION

Request #3: *Provide the "Construction Management Agreement between Solvay Soda Ash Expansion Joint Venture and Solvay Minerals, Inc." [Bates SOLVAY_000005].*

(b) (4) [redacted]

Request #5: *The table below lists the original calciner design capacities and the current operating capacities as reported by Solvay in response to item 2 of the 2014 Request [Bates SOLVAY2_000001]. If the information provided by Solvay has changed since its 2014 responses, please update that information. Additionally, for any calciner with a capacity increase since its original design, please provide the following:*

A. the dates of each capacity increase after the calciner's original design;
B. the new capacity of the calciner after the increase; and
C. a reference to any permit modifications made to capture the capacity increase.

EPA Request 2: For Each Calciner at the Facility, Provide:

Question	CA-1	CA-2	CA-3	CA-4
a) Emission Unit ID No.	AQD #17	AQD #17	AQD #48	AQD #80
b) Date operation began	1982	1982	1992	2000
c) Original design capacity (tons/hour of ore feed and tons/hour of calcined material for monohydrate calciners)	114 tph	114 tph	200 tph	275 tph
d) Current operating capacity (tons/hour of feed and tons per hour of calcined material for monohydrate calciners)	162 tph	162 tph	200 tph	325 tph

A table containing the information responsive to Request #5 a), b) and c) is attached and labeled "2016 Request #5."[2] The table also corrects an error from Solvay's response to the 2014 Request. While assembling the documents for this response, Solvay located the actual design capacity in the original specifications for the equipment used at CA-3. In its response to the 2014 Request No. 2 for CA-3, Solvay stated that the original design capacity was 200 tph. The original design capacity was actually 137 tph for CA-3. The 200 tph operating capacity was based on a later permitting action. In the response to 2014 Request No. 2, Solvay listed the permitted capacity for CA-3 as the original design capacity. That error is corrected in the attached table.

(b) (4) [redacted]

[2] Bates No. SOLVAY2016_5_000001.

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There has not been any change in the operating capacity of any of the four calciners at the Facility since Solvay's response to 2014 Request No. 2.

Request #9: *In its response to item 10 of the 2014 Request, Solvay provided raw ore feed for all calciners combined from January 1995 to December 1997. Solvay responded that the data for each individual calciner does not exist. Please provide estimated feed data information for each individual calciner from January 1995 to December 1997, based on best individual data.*

A table containing the information responsive to Request #9 is attached and labeled "2016 Request #9."[3] As Solvay stated in response to the 2014 Request No. 10 a), Solvay did not track the raw ore feed individually for CA-1, CA-2, and CA-3 for the period January 1995 to December 1997. As requested by EPA, the attached raw ore feeds for CA-1, CA-2, and CA-3 for the period of January 1995 to December 1997 are based on information contained in records whose purpose was not to measure the raw ore feed for calciners. Accordingly, the ore feed amounts for each of the three calciners provided in this response are estimations from these secondary information sources and the data contained in the table may overstate or understate the actual ore feed for each calciner by some unknown amount for the January 1995 to December 1997 period resulting in differences from the combined raw ore feed numbers provided in the response to 2014 Request No. 10 a).

Request #10. *In addition to the summary results of all stack tests for PM, PM10, and PM2.5 that was provided in Solvay's response to item 11 of the 2014 Request, provide the summary results for all stack tests for Carbon Monoxide, Nitrogen Oxide, and Sulfur Dioxide.*

Solvay does not conduct stack tests for Nitrogen Oxide (NO_x) or Sulfur Dioxide (SO_2) because these pollutants are measured by a CEMS. Solvay provided the monthly data for NO_x and SO_2 as measured by the CEMS in its response to 2014 Request No. 11 d) at Bates Nos. SOLVAY11_000001 - SOLVAY11_000005. Solvay was able to locate CEMS reports for NO_x and SO_2 beginning in 2002. Solvay has made a good faith effort to identify prior CEMS reports but has not been able to locate such records. If such reports exist, they may be stored in a mined-out area of the underground mine which Solvay had used for records storage. Because of mine collapses in the mined-out area, however, Solvay cannot safely search or retrieve these records.

Stack tests for Carbon Monoxide (CO) have only been conducted in June 2011, October 2011 and November 2015. A table containing the summary results for CO stack tests is attached and labeled "2016 Request #10."[4]

[3] Bates Nos. SOLVAY2016_9_000001 – SOLVAY2016_9_000002.
[4] Bates No. SOLVAY2016_10_000001.

* * * * *

Please direct any questions or concerns about this response to Kelly A. Johnson, Solvay's outside counsel, at (202) 654-6933, or kajohnson@hollandhart.com.

Sincerely,

Todd Brichacek
Senior Vice President & Site Manager
Green River Operations

Enclosure

cc: Lauren Hammond, R8ENF-L
Carlos Escobar, Solvay
Jeffrey Lang, Solvay
Kelly A. Johnson, Holland & Hart

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STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

Todd Brichacek
Senior Vice President & Site Manager
Green River Operations